

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

**YAIR GRANADOS JOAQUIN, JOSE §
HERIBERTO ESCOBEDO CAMARGO, §
and JANET HERRERA RUBIO, on §
Behalf of Themselves and Others §
Similarly Situated, §
Plaintiffs, §**

V. §

**ALFREDO HINOJOSA, THE §
COLISEUM INC dba EL COLISEO and §
THE COLISEUM OF AUSTIN, §
ARCABABA, INC. dba OK CORRAL- §
FORT WORTH, SPANGLER §
ENTERTAINMENT LLC dba OK §
CORRAL-DALLAS, MAC 23, INC, dba §
OK CORRAL-OKLAHOMA CITY, EL §
VOLCAN SOCIAL CLUB INC dba FAR §
WEST-DALLAS, RODEO 2000 SOCIAL §
CLUB, INC. dba FAR WEST-TYLER, §
and OLD TOWN RANCHERS, INC. dba §
MEDUSA §
Defendants §**

CIVIL ACTION NO. 1:15-CV-00787-LY

**PLAINTIFFS' CORRECTED MOTION FOR LEAVE TO FILE
PLAINTIFFS' SECOND AMENDED COMPLAINT**

TO THE HONORABLE COURT:

Before the Court is Plaintiffs' Response to Defendants' Motion to Dismiss and Motion for Leave to File Plaintiffs' Second Amended Complaint. [Dkt No. 25.] The Clerk of this Court issued a Deficiency Notice instructing Plaintiffs to file corrected pleadings, separating the Response from the Motion for Leave. [Dkt No. 26.] Plaintiffs file this Corrected Motion for Leave.

Plaintiffs refer the Court to and incorporate by reference their Corrected Response to Defendant The Coliseum, Inc.'s Motion to Dismiss. [Dkt No. 27.] Plaintiffs' proposed Second Amended Complaint (attached hereto as Exhibit 1) responds to Defendant's concerns by whittling down the claims asserted (namely, by eliminating the six causes of action previously pleaded under Oklahoma common law) and providing additional factual enhancement out of an abundance of caution to further buttress the plausibility of their claims for relief.

Plaintiffs' Second Amended Complaint easily includes sufficient well-pleaded factual allegations to plausibly state a claim for relief for each cause of action raised against The Coliseum, Inc. Accordingly, the Court should grant Plaintiffs' motion for leave to amend in order to file their Second Amended Complaint and deny Defendant's Motion to Dismiss with prejudice to refiling.

Respectfully submitted,

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that the document above was served on the following parties by email via the CM/ECF system on January 29, 2015:

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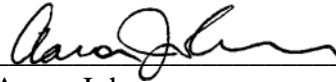
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